

# **EXHIBIT 6**

**Klamath Falls City School District**  
**Record of Progress on Corrective Action as Required by ODE Final Order Case 21-054-038**  
**Report Dated March 20, 2023**

**Background**

On March 9, 2022, the Oregon Department of Education (ODE) released Findings of Fact, Conclusions, and Final Order in Case 21-054-038, which involved the Klamath Falls City School District (KFCSD). As a result of this order, KFCSD was required to implement a number of corrective actions detailed in Actions 1-11, which are described below. This document additionally summarizes the response and actions taken by KFCSD as a result of the Final Order. In some cases, KFCSD requested and was granted an extension of time by the ODE due to additional time needed to carry out corrective actions.

Below please find the actions required, their corresponding due dates for submission, and the progress made on the corrective actions.

Action Required	Due Date/Submissions	Progress
1. The District must develop a plan to ensure appropriate compensatory education is provided for the twenty-three students in the RISE program for whom the District has implemented an abbreviated (shortened) school day. This plan must be based on an individual review of each student's records and include, by student:	<b>May 9, 2022</b>  Submit to ODE a copy of the compensatory education plan.	<p>On June 6, 2022, Heidi Snodgrass, the Special Education Director of the Klamath Falls City School District (KFCSD), submitted a plan for compensatory education for the students in the RISE Program, which was later approved.</p> <p>It should be noted that out of the 23 students addressed in the ODE order, six had moved out of the district by the end of the 2022-23 school year. Ms. Snodgrass contacted each of these students' parents individually, but they were not interested in receiving compensatory services as they were no longer with the district.</p> <p>Furthermore, the parents of two students (who were siblings) stated that they were not interested in receiving services during the summer months. Ms. Snodgrass met with these parents again in January 2023, but they once again declined compensatory services for the upcoming summer of 2023.</p>

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<ul style="list-style-type: none"> <li>• A description of the compensatory education service(s) to be provided;</li> <li>• The total amount of each compensatory education service to be provided;</li> <li>• Individualized rationale used to determine type and amount of compensatory education needed;</li> <li>• The anticipated initiation and completion dates of compensatory education;</li> <li>• Where compensatory education will be provided;</li> <li>• Who, by role/position, will be responsible for providing compensatory education;</li> <li>• Who, by role/position, will be responsible for ensuring</li> </ul>		

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<p>compensatory education occurs; and</p> <ul style="list-style-type: none"> <li>Evidence that will be maintained to ensure completion of compensatory education.</li> </ul>		
2. The District must secure ODE approval of its compensatory education plan.	<b>June 9, 2022</b> Submit to ODE a copy of the compensatory education plan.	<p>On June 10, 2022, the ODE approved the KFCSD compensatory education plan, which is now located in the ODE's secure file records.</p> <p>The KFCSD compensatory education plan included all of the required elements listed in (1) above.</p>
3. The District must implement the approved compensatory education plan with fidelity.	<b>Within 7 work days identified in the approved plan.</b> Evidence of completion of required compensatory education.	<p>The compensatory education plan for each student was completed as approved in August 2022. A copy of the schedule for the compensatory plan, as well as the attendance records for compensatory education, can be found in the ODE's secure file records.</p>
<p>4. ODE will conduct an onsite visit to review the files of the twenty-three students in the RISE Program.</p> <p>After receiving the onsite visit report, the District will convene an IEP team meeting for any student</p>	<b>June 9, 2022</b> For each IEP and placement meeting conducted, submit to ODE and the Parent or Adult Student, a copy of the IEP and placement team meeting notice(s), contact log regarding	<p>On May 25 and May 26, 2022, a team of five staff members from the Office of Enhancing Student Outcomes (OESO) within the ODE conducted an on-site visit with the KFCSD. The purpose of this visit was to review the files of the 23 students in the KFCSD RISE Program. A total of 17 files were reviewed, as six of the 23 students had moved out of the district. File reviews were conducted using a protocol developed by ODE personnel and based on IDEA regulations. Nineteen standards were selected for review, as they focused on the IEP requirements most closely related to abbreviated school day and other substantiated allegations contained within the Findings of Fact.</p>

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whose file review indicates the school day was inappropriately shortened. In convening, reviewing, and revising each IEP, the District will ensure special attention to the areas of noncompliance. Each IEP meeting will be followed by a meeting to review, and revise, as necessary, the placement decision.	the individual student's meetings, a complete copy of the IEP, and separate placement determination, any meeting notes or minutes, and copies of any prior written notices.	A complete report of this visit, including areas of noncompliance, was issued on June 23, 2022, and can be found in the ODE's file records.
<p>5. The District will convene an IEP team meeting for each student served within the District's RISE Program:</p> <ul style="list-style-type: none"> <li>• To consider whether the child's behavior impedes their learning or that of others;</li> <li>• If so, to consider whether a new or revised FBA is required;</li> <li>• If so, to seek consent for a reevaluation to conduct an FBA, and</li> </ul>	<p><b>As soon as possible but not later than June 16, 2022</b></p> <p><b>Reevaluations must be completed as soon as possible but not later than 60 school days from written parent consent. FBAs and, if appropriate, BIPs must be submitted to ODE within seven (7) work days of completion of the reevaluation.</b></p>	<p>By June 16, 2022, the District did reconvene an IEP meeting for each student served within the District's RISE Program. During each of these meetings, the team considered all instances of noncompliance as well as the need for reevaluations, FBAs, and BIPs.</p> <p><b>Follow-Up and Validation</b></p> <p>During January 24-26, 2023, two District Support Specialists from ODE made an on-site follow-up visit to KFCSD to review the files of the 17 students in the RISE program for validation purposes. The Specialists also interviewed the Special Education Director Heidi Snodgrass and Julie Bainbridge, Assistant Supervisor of Special Services, concerning professional development and technical assistance the district had provided since the June 23, 2022, report was issued by ODE. Ms. Bainbridge, a retired principal with in-depth knowledge of special education, was hired by KFCSD in August 2022 to help oversee needed changes to the RISE Program and assist with making other needed</p>

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<p>for any other purposes the IEP team determines necessary, if any.</p> <p>The District must complete each reevaluation determined necessary as a result of these meetings, and reconvene in each of those instances to review the results of the FBA and determine the need for a BIP. The District must ensure development of an appropriate BIP in each instance where the IEP team determines it necessary.</p>	<p>For each student served within the District's RISE Program, submit to ODE evidence sufficient to demonstrate this action has been completed, including but not limited to, a copy of the IEP and placement team meeting notice(s), contact log regarding the individual student's meetings, a complete copy of the IEP, and separate placement determination, any meeting notes or minutes, copies of consents for reevaluation, copies of any prior written notices.</p> <p>For each student for whom a reevaluation was determined necessary, the District shall submit the</p>	<p>changes in areas identified in the Corrective Actions Order. ODE also made classroom visits to the RISE program during this time period.</p> <p>A total of 15 files were reviewed, as two of the students from the 17 student files previously reviewed had moved. Each of the 15 files had newly-developed IEPs or amended IEPs. Each file was reviewed individually by the two ODE specialists, and evidence was collected for the correction of noncompliance previously identified during the ODE onsite visit in May 2022. All files are now in compliance with ODE standards. Evidence of compliance was collected and can be found in ODE secure file records.</p> <p>It is also important to note that, of the 15 originally-identified RISE students still within the district, only two students remain on an abbreviated school day. Schedules indicate that a number of these students are now partially integrated into general education classes.</p> <p>One of these students in the RISE Program continues to have an abbreviated school day due to parent request. The IEP team for the second student made the decision for the student to remain on an abbreviated school day schedule using guidance from ORS 343.161. File reviews indicate that both students have step-up plans within their files, and the district is in compliance with other abbreviated school day requirements for these two students.</p>

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	completed FBA and any BIPs developed as a result of these meetings.	
<p>6. The District must develop a plan for a series of high quality district-wide special education trainings to occur for all building and program administrators, special education staff, and related services providers employed by the district, with at least one training session related to at least each of the following areas:</p> <ul style="list-style-type: none"> <li>• Procedural Safeguards, including parent participation requirements;</li> <li>• Coordinating the sequential processes and parent involvement from pre-referral to evaluation/re-evaluation to IEP</li> </ul>	<p><b>September 9, 2022</b> Submit to ODE copies of training plan for the training series, including at least the following:</p> <ul style="list-style-type: none"> <li>• Date, start time, and end time for each session;</li> <li>• General topic of each session;</li> <li>• Specific learning outcomes for each session;</li> <li>• Agenda for each session;</li> <li>• Instructional plan for each session; and</li> <li>• Assessment plan for each session.</li> </ul>	<p>KFCSD has organized a series of high quality district-wide and special education focused professional development sessions covering all areas of non-compliance and other identified concerns around behavior management, working with students experiencing autism and inclusion of students experiencing disabilities in the regular education classroom.</p> <p>Initially, ODE personnel and KFCSD personnel collaboratively developed a professional development plan that focused on areas of noncompliance. The agenda for this training, as well as slides, can be found in ODE files. ODE personnel provided this initial training on August 24-25, 2022. Attendees included all KFCSD building principals, the curriculum coordinator, special education teachers, and special education leadership personnel. The professional development activity addressed areas related to the noncompliance identified in the complaint, including special considerations in IEP development and implementation for students with complex needs, provision of FAPE in the Least Restrictive Environment (LRE), strategies for identifying and implementing appropriate supports for students with disabilities, discipline requirements, and review and revision of IEPs.</p> <p>In addition to this initial training, KFCSD has initiated several other professional development activities throughout the district during the 2022-23 school year focused on areas related to the corrective actions, as well as recommended areas of improvement. These activities are a result</p>

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<p>implementation and placement, including revisions between annual meetings;</p> <ul style="list-style-type: none"> <li>• Special considerations in IEP development and implementation for students with complex needs, including students who may meet criteria for more than one disability;</li> <li>• Provision of FAPE in the Least Restrictive Environment (LRE), the relationship of non-participation justification, placement decisions; and the requirements of SB 263;</li> <li>• Strategies for identifying and implementing appropriate supports (accommodations, modifications, supplementary aids and services, and</li> </ul>		<p>of both ODE recommendations and self-initiated technical assistance and include:</p> <ul style="list-style-type: none"> <li>• Procedural safeguards training and parent communication for all special education teachers (agenda available) (2022)</li> <li>• Week-long virtual TEACCH training out of the University of North Carolina attended by teachers and paraprofessionals in the RISE program (August 2022)</li> <li>• A team of principals, teachers, and administrators attended the multi-day Oregon Program Autism Training Program (OrPATS) (September 2022)</li> <li>• KFCSD contracted with Dr. Tricia Berg from Randy Sprick's Safe and Civil Schools for an ongoing series of in-person training sessions and school site visits using the Tier 1 CHAMPS curriculum across the district. The training began in September 2022 and continues through the present time. Sign-in sheets for these sessions are available in ODE file records.</li> <li>• KFCSD special education leadership planned and carried out a separate series of professional learning sessions for self-contained paraprofessionals in the district which included paraprofessionals in the RISE Program. To date, four out of the 7 sessions have occurred. These sessions, among others, include such areas as supporting students in the general education classroom, communicating with general education teachers during inclusion, CHAMPS for self-contained classrooms, behavioral differential reinforcement training, and de-escalation skills review.</li> <li>• Autism 101 General Information and Strategies Training by Gretchen Knutson, Autism Consultant</li> </ul> <p><b>Other Professional Development:</b></p>



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<p>supports, including behavior) for students with disabilities, and supports to personnel;</p> <ul style="list-style-type: none"> <li>Discipline requirements, related parent involvement, and record-keeping; and;</li> <li>Review and revision of IEPs.</li> </ul>		<ul style="list-style-type: none"> <li>Monthly meetings in which all special education teachers meet with the evaluation and specialist teams.</li> <li>Department meetings using previous file review forms (ODE-developed) with newly-written IEPs.</li> </ul> <p><b>Goalbook:</b> Additionally, the district has purchased and moved to all special education teachers using Goalbook across the district. Goalbook is an online platform that helps teachers develop well-written and measurable goals and additional components of the IEP that are based on state standards. The system also supports the use of progress monitoring assessments and provides recommended evidence-based interventions matched to student needs.</p>
7. The District must secure ODE approval of the training plan prior to implementation.	<b>October 9, 2022</b> Submit to ODE a copy of the training plan.	ODE's District Support Specialist for KFCSD has been in regular communication (several times per month) with KFCSD special education leadership personnel from June 2022 to the present time regarding professional development and technical assistance needs.
8. The District must implement the approved training plan with fidelity.	<p><b>Within seven (7) work days of each scheduled session</b></p> <p><b>All sessions must be completed no later than March 8, 2023.</b></p> <p>Submit evidence of completion of each training session, including a signed attendee list, which</p>	Both the schedules and sign-in sheets for these trainings were provided to ODE and can be located in ODE's files.

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	must include the name and position/role of each attendee, presenter(s), materials used, assessment results, and any meeting notes or minutes.	
9. With ODE assistance, the District must review existing District Special Education Policies, Administrative Regulations (AR), and District implementing procedures, forms, and materials to determine the need for revisions, with special attention to areas of noncompliance identified in this order.	<p><b>November 1, 2022</b> Email confirming mutually agreed upon date/time scheduled to review these items with ODE.</p> <p><b>December 1, 2022</b> Submit to ODE copies of reviewed documents, with proposed edits showing.</p> <p><b>December 1, 2022</b> Submit to ODE a copy of Klamath Falls City School Board procedures and timelines for amending Board-adopted policies.</p>	<p>A number of changes have occurred at the systems level since the Corrective Action was ordered and the ODE on-site visit in May 2022. With the approval of KFCSD Board of Education:</p> <ul style="list-style-type: none"> <li>• The KFCSD Board has approved new contracts for all school personnel that incorporate duties for serving on district- and school-wide behavior support teams.</li> <li>• KFCSD has hired and placed behavioral support specialists across the district. Each building in the district now has a behavioral support team with protocols and forms for working with students exhibiting what the district describes as Level 1 through Level 3 behaviors. The goal of these teams is to accommodate and solve problems at the building level. KFCSD special education leadership personnel report that building administrators have been remarkably helpful in this process.</li> <li>• KFCSD has also developed a new district-level behavior support team. These efforts are meant to coordinate proactive support for supporting students with behavior concerns at the Tier 1 level, as well as problem-solving for students exhibiting challenging behaviors.</li> <li>• KFCSD special education leadership personnel report ongoing formal meetings and “communicating out” to principals and</li> </ul>

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		<p>specialists about a new mindset on the appropriate use of abbreviated school days.</p> <p>In addition, several changes to internal procedures are reported with new forms developed and documented as follows:</p> <ul style="list-style-type: none"> <li>• Paperwork Checklist for Annual IEP and IEP Amendments</li> <li>• Paperwork Checklist for Re-Evaluation or Additional Eligibility</li> <li>• Paperwork Checklist for Initial Evaluation</li> <li>• Abbreviated School Day form and packet to parents</li> <li>• Checklist for Positive Support Plans (PSP), Student Success Plans (SSP), Functional Behavior Assessments (FBA), and Behavior Intervention Plans (BIP)</li> </ul>
10. Upon approval of proposed special education policy / procedure edits, the District must initiate the change processes within the District, referring Board-adopted information to the Board for consideration.	<p><b>January 6, 2023</b> Provide evidence of referral to District Board.</p> <p><b>March 8, 2023</b> Upon completion of Board process, submit copy of Board Agenda(s) and official minutes of meeting in which the Board acted upon the proposed revisions.</p>	Interviews with KFCSD leadership personnel indicate that these changes did not require the formal adoption of new policies and procedures by the KFCSD Board. Instead, they were simply approved by the Board.

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<p>11. The District will meet each month with staff working within the RISE Program, District administrators, ODE, and any other appropriate parties as determined by District or ODE, to review:</p> <ul style="list-style-type: none"> <li>• Progress related to any needed policy revisions;</li> <li>• Status of required training;</li> <li>• Status of required IEP meetings and resulting reevaluations; and</li> <li>• Any required compensatory education.</li> </ul>	<p><b>Meetings to be held monthly until all required corrective action has been completed. Evidence to be submitted within seven (7) work days of each meeting.</b></p> <p>For each meeting, submit evidence of completion, including copies of Agenda, attendee list, including name and position/role of each attendee, status updates for each required corrective action, and any additional meeting notes or minutes.</p>	<p>According to KFCSD special education leadership, communication with RISE Program staff occurs on a weekly, and often daily, basis. Additionally, the district reported taking the following actions:</p> <ul style="list-style-type: none"> <li>• Doubled the staff in the RISE program and established staffing guidelines.</li> <li>• Created a separate job position for RISE classified staff with specific training requirements and higher rates of pay.</li> <li>• Enlisted self-contained teachers to work with Dr. Tricia Berg from Safe and Civil Schools, emphasizing proactive and positive approaches to classroom management.</li> <li>• Dr. Berg provides technical assistance in person and conducts virtual walk-throughs of the RISE program, offering feedback to staff.</li> <li>• Conducting monthly paraprofessional trainings for paraprofessionals in self-contained classrooms focused on behavior management skills.</li> <li>• Adopted and trained teachers on using the STAR (Strategies for Teaching Based on Autism Research) curriculum in the RISE Program. This curriculum has been validated by multiple independent randomized control trials and was observed being implemented in the RISE classrooms.</li> <li>• Provided training on supervising paraprofessionals.</li> <li>• Staff have received training in Applied Behavior Analysis (ABA) techniques.</li> </ul> <p>It is also reported that the elementary building (Mills Elementary) which contains the RISE Program now shares space with an ABA clinic. Although not funded by the district, the program serves students in the RISE classroom as well as other students in the district. The clinic is associated</p>

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		with the Oregon Institute of Technology, a public university based in Klamath Falls.

The Oregon Department of Education expresses gratitude to the Klamath Falls City School District for successfully fulfilling the Corrective Actions outlined in ODE Final Order Case 21-054-038. Through file validation procedures, interviews, and classroom observations, it is evident that the RISE Program has undergone positive changes, resulting in a significant decrease in the use of abbreviated school day program placements, except in situations that fall under ORS 343.161(3). Additionally, the District has implemented proactive strategies to assist students with concerning behaviors by establishing district and school-level behavior support teams. Furthermore, the District has proactively engaged in several high-quality and personalized professional development activities, with the ultimate goal of enhancing the outcomes of all students in the District.